

monitoring resulted in this flow going on for 48 hours before the Mexican authorities notified the U.S. side of the border. Real time monitoring on both sides of the border is the best solution.

The DEIS carefully notes the changes at two gages, at each end of the US portion of the New River, based on expected "mitigation" proposed by the applicants. There appear to be no equivalent water gages in Mexico. In the Ambos Nogales area, there a US monitored water gages installed on the Mexican side of the Santa Cruz River and used by the Arizona Department of Water Resources for water management in Arizona.

The use of "wet-dry" cooling must not discharge treated water into the already troubled New River, thus the cooling system must recycle all its water, such as accomplished at the C.F.E. Aqua Prieta, Sonora plant.

There supporting rationale for not using "dry" cooling when compared to the "wet-dry cooling" is system discussed on page 2-36. Due to the long-term importance of water for communities on both side of the border, any application of "wet" cooling decreases water resources. Wet-dry cooling should not be an Alternative as the water supply is more valuable than electricity, as only dry cooling will have minimal cumulative effects. The decrease in efficiency on hot days is when others require water more than on cooler days, which lowers the value to this view.

This leads to the following questions:

- 3.1 Are two water gages enough to monitor the New River or should additional gages be installed in Mexico?
- 3.2 How often will the water be sampled for pollutants and where?
- 3.3 Will this provide adequate indicators and warning time, based on known pollutant levels in the New River, for people to be notified and sluice gated be closed to prevent ruining valuable crops?
- 3.4 How much will each of the contaminants be removed by the water treatment processes associated with generation?
- 3.5 Will all treated water be prevented from entering the water table or the New River?
- 3.6 What would be the long-term impacts of the water chemicals added to the electrical plant cooling water if it entered the New River and Salton Sea?
- 3.7 As clean and safe water is an objective for both sides of the border, are the water treatment plants in the US and in Mexico capable of handling and cleaning all of the known pollutants in this river so that the effluent is not hazardous to health? Is there anyway the power plants could contribute to cleaner water than is now present, such as operating sizable distillation plants (at least 100,000 gallons/hour) as a mitigation measure to remove salt and other impurities as an air cooling measure?
- 3.8 What are the specific details in terms of a design trade study, using objective, site-specific numeric data (such as specification sheets) instead of the existing subjective statements on page 2-36 needs to be completed before the DOE and BLM consider the "wet-dry" cooling approach?

Issue Four – Mitigation.

The mitigation measures included in Table S-1 are rather weak in ensuring a safe, healthy and sustainable environment for people and living things on both sides of the border.

This leads to the following questions:

Marshall Magruder Comments on DEIS for the Imperial Mexicali 230-kV Transmission Lines, 30 July 2004
Page 8 of 100

0024-3
(cont.)

0024-4

- 4.1 Can additional air quality monitoring stations be included so that the west and northwest of the transmission line and power plants be adequately monitored?
- 4.2 Can the US and Mexican air quality monitoring stations be networked so that real time air quality monitoring can be assessed on both sides of the border?
- 4.3 Can a co-generation distillation plant, of at least 100,000 gallons per hour, be included with the generators to remove harmful pollutants and salt from the New River? Could this be increased to 1,000,000 gallons of potable water per hour?
- 4.4 Can only "dry" coolers (and any cogeneration options) be installed with the generators?
- 4.5 Can air quality monitors be installed, as a system, to monitor all air pollutants to ensure continual compliance with air quality standards?
- 4.6 Can additional water monitoring stations be installed, including ones in Mexico, along the New River to continuously determine the safety of water?
- 4.7 Does the mitigation plans including bi-national sharing of water and air quality data, including real time monitoring in both countries with both countries receiving the same data?
- 4.8 How will the applicant's compliance with the mitigation measure be monitored, reported and tracked and what will be the consequences when not complying?
- 4.9 What mitigation measures are included to account for the loss of one or more towers, if destroyed by terrorist or a truck hits one and knocks it down?

Issue Five – Need for an Environmental Impact Statement.

A completely compliant EIS will include a bi-national Cumulative Effects Analysis, which DOE has stated is not required. Under Issue 1 above, a suggested approach was suggested.

Issue Six – Other Permitting Requirements.

The transmission line will cross the Pinto Wash, Figure 3.2-21, "FEMA 100-Year Floodplain of Pinto Wash" (page 3033). In Table 9-1, "Federal Environmental Statutes, Regulations and Orders" (page 9-3), indicates the Floodplain Management (EO 11988) reporting is required.

This leads to the following questions:

- 6.1 Has this transmission system been determined by the US Army Corps of Engineers to be "critical facility" and if so, then will the floodplain requirements be changed to "500-year" instead of the "100-year" requirements in section 3.2?
- 6.2 Will a Section 404 report be required?
- 6.3 Will a biological assessment and biological opinion be required for this project for the 19 species listed in 3.4.4, "Special Status Species"?

Issue Seven – Emergency Response Measures.

The risk of sabotage to these transmission lines is real and a possible threat to the distant users, with minimal local personnel. In 1.3.2, "Issues outside the Scope of the EIS," (page 1-11) and in Appendix B, 2.2.9, "Homeland Security" (page 7), the EIS response was the "homeland security issues is beyond the scope of the EIS." Specific response plans, which are probably company private, are not necessary for the responses to the below questions (the bad actor, a terrorist or truck isn't the key concern). The last question is to confirm that the Border Patrol has reviewed this project, and not their response.

Marshall Magruder Comments on DEIS for the Imperial Mexicali 230-kV Transmission Lines, 30 July 2004
Page 9 of 100

0024-4
(cont.)

0024-5
(cont.)

0024-6

0024-7

This leads to the following questions:

- 7.1 What are the impacts to the users of each of these two transmission line system if one or more towers was disabled (knocked down) by a terrorist or even a truck hitting it?
- 7.2 How many days would it take to replace a down tower and what alternatives would exist for such a situation?
- 7.3 Would the two applicant's responses be different if such an incident occurred on either side of the border, and if so, what impacts with that have on restoration time?
- 7.4 Has the US Border Patrol been involved in the review of this DEIS?

Issue Eight – System Capabilities.

This issue appears to be closed, as all transmission lines appear to be initially constructed as double-circuits and a second environmental review will not be necessary in future years.

Issue Nine – National Gas and Transmission Line Impacts.

In S.4.2, "Issues outside the Scope of the EIS," (page S-24), in "1.3.2, "Issues outside the Scope of the EIS" (page 1-12) and in Appendix B, 2.2.1, "National Environmental Policy Act (NEPA) Process/Decision Making," (page 3) all state that the nearest natural gasline is more than 50 miles away. The concern was with natural gaslines in Mexico and the criteria of the Gas Technology Institute (GTI) Report 105 concerning minimum separate between electrical and natural gas transmission lines.

The Federal Director of the Office of Pipeline Safety told me that the National Academy of Science was assessing the complex soil resistance (ohms) or conductivity, pipe corrosion, various active and passive cathodic protection schemes, voltage and current at various distances above ground, transmission tower earth-grounding in various soils (desert or dry environments have poorest grounding), and several additional factors to prevent unwanted interactions between gaslines and electrical transmission line systems.

The interactive impacts of passive or active cathodic protection systems, electrostatic discharges and electromagnetic effects should not cause premature failure of the gasline, sparks from vehicles passing under the lines, or induced current traveling through the gasline to unsuspecting users, such as when one turns on a stove to receive a serious shock or to cause an air-natural gas mixture that a spark sets of a significant fuel-explosive. The answer is complex.

The Baja Norte Pipeline and two 230 kV lines appear to run in parallel, where most long-term corrosion damage to the pipelines may occur.

This leads to the following questions:

- 9.1 Are all the transmission lines at the appropriate safe distance from natural gasline, including those in Mexico, so that various interactions are insignificant?

Marshall Magruder Comments on DEIS for the Imperial Mexicali 230-kV Transmission Lines, 30 July 2004
Page 10 of 100

Document 0025

JUL-30-2004 20:41 FROM:SIERRA CLUB SAN DIEG 6192991742

TO:12822875736

P.1/3



San Diego Chapter
Serving the Environment in San Diego and Imperial Counties

Office (619) 299-1743
Conservation (619) 299-1741
Fax (619) 299-1742
Voice Info. (619) 299-1744
Email admin@sierraclubsandiego.org

0024-7
(cont.)

0024-8

July 30, 2004

Mrs. Ellen Russell
Office of Electric Power Regulation
Office of Fossil Energy
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585-0301

Dear Mrs. Russell,

This letter is the San Diego- Imperial County chapter of the Sierra Club response to the Draft Environmental Impact Statement for the Imperial- Mexicali 230-kv Transmission Lines (DOE/EIS-0365).

0024-9

We find the draft has significant deficiencies with regard to the alternatives proposed. The air quality in Imperial County is non-compliant with the Clean Air Act provisions. We feel the cumulative effects of power plants and transmission lines in Imperial County cannot be offset. How do you put a value on the anticipated deaths due to the worsening air quality if these power plants come online? They should never have been built without a proper environmental impact report, including CEQA provisions and cumulative impacts of the power plants in the region, LNG importation and expansion of transmission lines.

We propose an economic study be included to compare a solar manufacturing plant versus a natural gas power plant. This study to include air quality, cost benefit analysis, economic impacts and totals life cycle evaluation of solar generated. If the citizens of Imperial County have to endure electricity generation in their county, then a proper economic analysis needs to be performed.

In addition we find the following incorrect analysis of basic sciences performed by the consultants.

1. Improper AQ analysis by DOE leads DOE to conclusion that PM₁₀ and NO_x emission offsets are not necessary for the power plant emissions.
2. Proper AQ analysis confirms that emission offsets is necessary.

0025-1

0025-2

0025-3

3820 Ray Street, San Diego, CA 92104-3623
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San Diego Chapter
Serving the Environment in San Diego and Imperial Counties

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Voice Info. (619) 299-1744
Email admin@sierraclubsandiego.org

3. Appropriate AQ mitigation: A total 733 tons of PM₁₀ emissions and approximately 400 tons of NO_x in Imperial County and Mexicali must be offset to account for PM₁₀ and NO_x emissions from the InterGen (LRPC) and Sempra (TDM) plants.
4. Diversion of low salinity water destined for New River to LRPC and TDM plants results in evaporation of nearly 3.5 billion gallons per year of water (in power plant cooling towers) that would otherwise reduce salinity of New River, and the discharge of nearly 1 billion gallons of high salinity wastewater into the New River.
5. Loss of this flow in the New River will expose nearly 100 additional acres of Salton Sea shoreline and result in up to 100 tons per year of PM₁₀ emissions from the exposed shoreline.
6. The New River exceeds the 4,000 mg/l TDS ceiling established for Colorado River Basin rivers near its terminus prior to entering the Salton Sea. High salinity wastewater discharges from LRPC and TDM plants, ranging from 4,400 to 4,800 mg/l, exacerbate New River exceedances of the 4,000 mg/l TDS ceiling.
7. Appropriate water quality mitigation: Retrofit a dry cooling system to the existing wet cooling system at each plant. Design the parallel "wet-dry" cooling system to reduce water consumption by 90 percent or more over the current wet cooling system. Add a zero liquid discharge system to treat the remaining wastewater to eliminate high salinity wastewater discharge to the New River.
8. Add explicit environmental conditions to the Presidential Permits for LRPC and TDM. Suggested permit conditions are:
 - All PM₁₀ and NO_x emissions must be completely offset within two years of the issuance of an approved Presidential Permit;
 - The DOE will enjoin use of the transmission line(s) at any time the plants are in violation of the air emission limits specified on p. G-3 and p. G-4 of the DEIS;
 - Air monitoring data will routinely/continuously be provided to Imperial County APCD authorities by LRPC and TDM;
 - Averaging time for all air pollutants is 3 hours;
 - Consumptive water use is limited to 717 acre-ft/yr at LRPC and 350 acre-ft/yr at TDM;
 - Data from an approved flow monitor must be routinely provided to the Regional Board to verify water consumption;
 - Discharge of wastewater to the New River that has not been treated for salinity removal is prohibited.

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We would like to work with the Department of Energy to perform an economic study of the benefits of solar generation of electricity versus natural gas generated electricity. We feel serious consideration should be given for denying an operating permit. If a permit is issued significant offsets should be provided to Imperial County with community input as to how this should be accomplished. This will help lead to reducing our dependence on foreign oil and provide clean renewable energy for generations to come.

Sincerely,

Kenneth M. Smokoska
Air Quality Committee - Chair

0025-9

3820 Ray Street, San Diego, CA 92104-3623
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Document 0026

Page 1 of 2

Russell, Ellen

From: mdoyle1000 [mdoyle1000@cox.net]
Sent: Friday, July 30, 2004 12:12 PM
To: Russell, Ellen
Subject: Semptra/Intergen Power Lines DEIS

July 29, 2004

Mrs. Ellen Russell
Fossil Energy FE-27
U.S. Department Of Energy
1000 Independence Ave. SW
Washington DC 20585-0350

Dear Mrs. Russell,

I'm writing in response to the Draft Environmental Impact Study (DEIS) concerning the new 230KV Mexicali/Imperial Substation power transmission lines Connecting Intergen's LRPC and Semptra's TDM plants to the US grid.

First, I am outraged that this project was approved and constructed before a DEIS was issued, much less reviewed. Such a backwards process is not permissible. Any major projects must be carefully reviewed for environmental impacts prior to construction. The local desert ecology is extremely sensitive. If those charged with its protection fail in their duties, none of it will survive. Additionally, this region is rich in Native American cultural sites, which also require protection from major construction projects.

Second, I believe that fact that the transmission lines have already been built does not preclude the implementation of a number of measures to reduce their impact. I strenuously urge the following:

1. Upgrade emission controls:

The proximity to the United States of the power generation sources connected to these lines means that the emission from these sources will affect the air quality in adjacent US areas. The obvious target of the output of these plants is the Southern California market. Taken together, these make the project equivalent to any new US power plant project. In my view this requires that the strictest current emission standards be applied. I call on you to make the license to operate these transmission lines conditional on the installation and maintenance of the equipment meeting highest emission standards listed in the DEIS.

2. Cooling technology:

I urge the use of dry or wet-dry cooling technology to reduce impacts on the stressed water supply in the

8/16/2004

Page 2 of 2

area. According to experts in the field, the efficiency penalty for using these cooling technologies is a fraction of that stated in the DEIS.

3. FTHL management plan:

The Flat-Tailed Horned Lizard, a soon to be listed endangered species, is native to the region. I call on DOE to require mitigation measures commiserate with the sensitivity of this rare specie, and to encourage BLM to develop a true management plan to deal with this problem.

Thank you for incorporating my comments into the discussion and record.

Regards,

Mark Doyle
4804 50th ST
San Diego, CA 92115
619-229-9103

0026-1

0026-2

0026-3

8/16/2004

0026-3
(cont.)

0026-4

0028-1

Document 0028

Dear Ms. Russell,
I believe it is important that energy producers outside the United States meet our environmental standards. Please make sure the environment is protected fully.
Thank You
Martin Pleasant

0027-1

Document 0027

Ms. Ellen Russell

Dear Ms. Russell,

I am very concerned about U.S. power plant developers taking advantage of less stringent standards in Mexico to profit at the expense of public health and the environment. I ask that the Department of Energy require that Semptra Energy and Intergen mitigate the impacts of their power plants before granting presidential permits, and that DOE condition any permits on mitigation.

Communities along the U.S.-Mexico border suffer from poor air quality and scarcity of clean water. Imperial County, California, has the highest childhood asthma rate in the state. Pulmonary sickness rates are also elevated in Mexicali, a city of 600,000 just south of Imperial County in Mexico.

The draft EIS prepared by DOE for these two power plants clearly identifies significant air and water impacts, while at the same time concluding that these impacts do not reach a sufficient level of significance to require mitigation. DOE misapplies U.S. air quality regulations, ignores the Colorado River Basin water quality ceiling of 4,000 mg/l salinity, and ignores impacts in Mexico when inclusion of these impacts further demonstrates the need for impact mitigation and conditional permitting.

DOE should not place the economic interests of U.S. power developers ahead of the public health of U.S. and Mexican citizens living in the vicinity of these plants, nor ahead of the need to protect the New River, an important source of fresh water for the Salton Sea National Wildlife Refuge. I urge you to craft adequate air and water quality mitigation measures in the final EIS and in any permits based thereon, that effectively address the air and water quality impacts caused by these two power plants.

Sincerely,

Carole Levenson
492 Staten Avenue #1103
Oakland, California 94610

0030-1

Document 0030

Dear Energy Secretary Spencer Abraham c/o Mrs. Ellen Russell

Energy Secretary Spencer Abraham,

The majority of California residents, along with Greenpeace, are demanding clean renewable resources, but multinational corporations are pressuring both States to invest in foreign liquid natural gas that could fuel an explosion of dirty power plants on the border. Instead, the U.S. and Mexican governments should be working to bring clean renewable energy to Mexico and the California.

The residents of the California and Mexico border deserve clean renewable energy sources. These populations suffer from poor air quality and scarcity of water. Imperial County, California has by far the highest childhood asthma rates in the State. Pulmonary sickness rates are also elevated in Mexicali, a city of 600,000 just south of Imperial County. The county is a Federal non-attainment area for PM10 and ozone. Air monitoring data available for Mexicali show the city's air quality is at least as bad as conditions in Imperial County. DOE's failure to insist on emission offsets for nitrogen oxide (NOx) and PM10 emissions from Interge's La Rosita Power Complex (LRPC) and Semp's Termoelectrica de Mexicali (TDM), threatens the health and well being of communities on both sides of the border. Adequate air and water quality mitigation measures must be included in the final EIS to effectively address the air and water quality impacts caused by the LRPC and TDM power plants.

The recent scandal involving Interge's misrepresentation of its environmental practices indicates that Presidential Permits should not be granted. Interge displayed its complete disregard for the pollution control commitments made to the DOE by failing to install advanced smog controls on one of its two export units at the time of commercial startup (June 2003). When local communities discovered Interge's failure, the result was a two month forced shutdown of the unit, which ended only when the appropriate pollution control system was installed. The uncontrolled unit generated hundreds of tons of NOx beyond what the DOE estimated when initially granting a Presidential Permit that allowed Interge to transmit power to the U.S. While the situation has now been corrected, the damages done while the plant was operating without meeting environmental standards are reprehensible. The

0029-1

Document 0029

Ellen Russell
NEPA Document Manager
Office of Fossil Energy (FE-27)
U.S. Department of Energy
1000 Independence Avenue, SW.
Washington, DC 20585-0350

Dear Ellen Russell,

I am very concerned about U.S. power plant developers taking advantage of less stringent environmental standards in Mexico to profit at the expense of public health and the environment. I ask that the Department of Energy (DOE) require that Semp's Energy and Interge mitigate the impacts of their power plants before being granted presidential permits, and that DOE condition any permits on mitigation.

Communities along the U.S.-Mexico border already suffer from poor air quality and scarcity of clean water. Imperial County, California, has the highest childhood asthma rate in the state. Pulmonary sickness rates are also elevated in Mexicali, a city of 600,000 just south of Imperial County in Mexico. The DOE's failure to insist on emission offsets for nitrogen oxide (NOx) and particulate emissions from Interge's La Rosita Power Complex and Semp's Termoelectrica de Mexicali threatens the health and well-being of highly stressed communities on both sides of the border.

The draft Environmental Impact Statement (EIS) prepared by the DOE for these two power plants clearly identifies significant air and water impacts, while at the same time concludes that these problems do not reach a sufficient level of significance to require mitigation. The DOE misapplies U.S. air quality regulations, ignores the Colorado River Basin water quality ceiling of 4,000 mg/l salinity, and ignores impacts in Mexico when inclusion of these effects further demonstrates the need for mitigation and conditional permitting.

The DOE should not place the economic interests of U.S. power developers ahead of the public health of U.S. and Mexican citizens, nor ahead of the need to protect the New River, an important source of fresh water for the Salton Sea National Wildlife Refuge. I urge you to craft adequate air and water quality mitigation measures in the final EIS and in any permits based upon them.

Sincerely,

lack of accountability in the current Presidential Permit process must be addressed and corrected.

The two power projects should be retrofitted to parallel wet-dry cooling systems. This would greatly reduce the amount of water used by the plants while maintaining full power generating capacity on hot days. The parallel cooling option would also restore most of the river's flow to the Salton Sea and minimize PM10 emissions from exposed shoreline. The New River that is affected by this salinity is crucial because it flows northward from Mexicali to the Salton Sea National Wildlife Refuge in Imperial County. The Salton Sea suffers from ever increasing salinity and decreased volume, which exposes the shoreline to wind erosion. These harms jeopardize its status as one of the most important migratory bird habitats in the West.

The salinity problem is exacerbated by the plants' practice of dumping high salinity wastewater directly into the New River. A prohibition on the dumping of high salinity wastewater into the New River would effectively address the dangerous changes in the salinity levels of the New River and the Salton Sea.

Secretary Abraham, as the head of the Department of Energy, you should not place the economic interests of U.S. power developers ahead of the public health of U.S. and Mexican citizens, nor ahead of the need to protect the New River. I urge you to craft adequate air and water quality mitigation measures in the final EIS that effectively address the air and water quality impacts caused by the power plants. I also urge you to work together with the Mexican and California governments to bring clean renewable energy solutions to the region. Renewable energy like wind and solar will solve the air and water problems that plague the area and help solve our looming global warming crisis.

0030-1
(cont.)

0030-2

0030-3

Document 0030a

Dear Energy Secretary Spencer Abraham c/o Mrs. Ellen Russell

I am very concerned about U.S. power plant developers taking advantage of less stringent standards in Mexico to make additional profits in the U.S. at the expense of public health and the environment. Population centers along the U.S.-Mexico border generally suffer from poor air quality and scarcity of water. Imperial County, California has by far the highest childhood asthma rates in the State. Pulmonary sickness rates are also elevated in Mexicali, a city of 600,000 just south of Imperial County. The county is a Federal non-attainment area for PM10 and ozone. Air monitoring data available for Mexicali show the city's air quality is at least as bad as conditions in Imperial County. DOE's failure to insist on emission offsets for nitrogen oxide (NOx) and PM10 emissions from Interger's La Rosita Power Complex (LRPC) and Semptra's Termoeléctrica de Mexicali (TDM), threatens the health and well being of communities on both sides of the border. Adequate air and water quality mitigation measures must be included in the final EIS to effectively address the air and water quality impacts caused by the LRPC and TDM power plants.

The recent scandal involving Interger's misrepresentation of its environmental practices indicates that adequate and ongoing monitoring, reporting and enforcement provisions must be made if Presidential Permits are going to be granted. Interger displayed its complete disregard for the pollution control commitments made to the DOE by failing to install advanced smog controls on one of its two export units at the time of commercial startup (June 2003). When local communities discovered Interger's failure, the result was a two month forced shutdown of the unit, which ended only when the appropriate pollution control system was installed. The uncontrolled unit generated hundreds of tons of NOx beyond what the DOE estimated when initially granting a Presidential Permit that allowed Interger to transmit power to the U.S. While the situation has now been corrected, the damages done while the plant was operating without meeting environmental standards are reprehensible. The lack of accountability in the current Presidential Permit process must be addressed and corrected.

The two power projects should be retrofitted to parallel wet-dry cooling systems. This would greatly reduce the amount of water used by the plants while maintaining full power generating capacity on hot days. The parallel cooling option would also restore most of the river's flow to the Salton Sea and minimize PM10 emissions from exposed shoreline. The New River that is affected by this salinity is crucial because it flows northward from Mexicali to the Salton Sea National Wildlife Refuge in Imperial County. The Salton Sea suffers from ever increasing salinity and decreased volume, which exposes the shoreline to wind erosion. These harms jeopardize its status as one of the most important migratory bird habitats in the West.

The salinity problem is exacerbated by the plants' practice of dumping high salinity wastewater directly into the New River. A prohibition on the dumping of high salinity wastewater into the New River would effectively address the dangerous changes in the salinity levels of the New River and the Salton Sea.

0030a-1

0030a-2

0031-1

Document 0031

Ellen Russell
NEPA Document Manager
Office of Fossil Energy (FE-27)
U.S. Department of Energy
1000 Independence Avenue, SW.
Washington, DC 20585-0350

Dear Ellen Russell,
I ask that the Department of Energy (DOE) require that Sempra Energy and Intergen mitigate the impacts of their power plants before being granted presidential permits, and that DOE condition any permits on mitigation. It is clearly pointless to have clean air standards if they can be circumvented by positioning plants near the border and then selling the power they produce across the border.

Sincerely,
Kent Wooldridge

0030a-3

Secretary Abraham, as the head of the Department of Energy, you should not place the economic interests of U.S. power developers ahead of the public health of U.S. and Mexican citizens, nor ahead of the need to protect the New River. I urge you to craft adequate air and water quality mitigation measures in the final EIS that effectively address the air and water quality impacts caused by the power plants.

Sincerely,

Sincerely,
Frank Stivers
Ripley, Ohio

0033-1

Document 0033

Dear Ellen Russell,

I am very concerned about U.S. power plant developers taking advantage of less stringent environmental standards in Mexico to profit at the expense of public health and the environment. The DOE should not place the economic interests of U.S. power developers ahead of the public health of U.S. and Mexican citizens, nor ahead of the need to protect the New River, an important source of fresh water for the Salton Sea National Wildlife Refuge. I urge you to craft adequate air and water quality mitigation measures in the final EIS and in any permits based upon them. Sincerely,

Stacy L. Ozesmi

--
Stacy L. Ozesmi, PhD

current address:
31 Redtail Dr #27
Coralville, IA 52241
319 339-4677
stacyozesmi@earthlink.net

0032-1

Document 0032

Ms. Ellen Russell

Dear Ms. Russell,

I am very concerned about U.S. power plant developers taking advantage of less stringent standards in Mexico to profit at the expense of public health and the environment. I ask that the Department of Energy require that Semptra Energy and Intergen mitigate the impacts of their power plants before granting presidential permits, and that DOE condition any permits on mitigation.

DOE should not place the economic interests of U.S. power developers ahead of the public health of U.S. and Mexican citizens living in the vicinity of these plants, nor ahead of the need to protect the New River, an important source of fresh water for the Salton Sea National Wildlife Refuge. I urge you to craft adequate air and water quality mitigation measures in the final EIS and in any permits based thereon, that effectively address the air and water quality impacts caused by these two power plants.

Sincerely,

Gary Brazel
140 Cadman Plaza West Apt.10D
Brooklyn, New York 11201

0035-1

Document 0035

Ms. Ellen Russell

Dear Ms. Russell,

As a concerned citizen and compassionate human being, I am horrified at U.S. power plant developers taking advantage of less stringent standards in Mexico to profit at the expense of public health and the environment.

I ask that the Department of Energy require that Sempra Energy and Intergen mitigate the impacts of their power plants before granting presidential permits, and that DOE condition any permits on mitigation.

Thank you kindly.

Sincerely,

Casey Roth
291 S. Euclid Avenue
#210
Pasadena, California 91101

0034-1

Document 0034

Ms. Ellen Russell

Dear Ms. Russell,

I am very concerned about U.S. power plant developers taking advantage of less stringent standards in Mexico to profit at the expense of public health and the environment. I ask that the Department of Energy require that Sempra Energy and Intergen mitigate the air and water impacts of their power plants before granting presidential permits, and that DOE condition any permits on mitigation.

The draft EIS prepared by DOE for these two power plants clearly identifies these impacts, while at the same time concluding that these impacts do not reach a sufficient level of significance to require mitigation. DOE misapplies U.S. air quality regulations, ignores the Colorado River Basin water quality ceiling of 4,000 mg/l salinity, and ignores impacts in Mexico when inclusion of these impacts further demonstrates the need for impact mitigation and conditional permitting.

DOE should not place the economic interests of U.S. power developers ahead of the public health of U.S. and Mexican citizens living in the vicinity of these plants, nor ahead of the need to protect the New River, an important source of fresh water for the Salton Sea National Wildlife Refuge. I urge you to craft adequate air and water quality mitigation measures in the final EIS and in any permits based thereon, that effectively address the air and water quality impacts caused by these two power plants.

Sincerely,

Ron Richards
1546 E. Blacklidge Dr.
Tucson, Arizona 85719

0037-1

Document 0037

Ms. Ellen Russell NEPA Document Manager
Office of Fossil Energy (FE-27)
U.S. Department of Energy
1000 Independence Avenue, SW.
Washington, DC 20585-0350

Dear Ms. Russell,

It has come to my attention that two U.S. power plant developers (Sempra Energy and Intergen) are seeking permits to send electricity generated at plants in Mexico near its border with the U.S. into the United States. I also understand that these plants do not currently meet environmental standards imposed by the U.S. for its power plants. As granting them permits to distribute energy in the U.S. would likely encourage other such operations, to the detriment of surrounding areas’ states of personal and environmental health, I encourage you to not to grant these plants permits to distribute their power in the U.S. unless they can meet the standards that we require of our own power plants.

Thank you for your time.

Sincerely,

B. Todd Shirley
Jersey City, New Jersey

0036-1

Document 0036

Dear Ellen Russell,

I am writing to insist that the Department of Energy (DOE) require that Sempra Energy and Intergen mitigate the impacts of their power plants before being granted presidential permits, and that DOE condition any permits on mitigation. I am very concerned that U.S. power plant developers are taking advantage of less stringent environmental standards in Mexico to profit at the expense of public health and the environment.

The draft Environmental Impact Statement (EIS) prepared by the DOE for these two power plants clearly identifies significant air and water impacts. Yet it concludes that these problems do not reach a sufficient level of significance to require mitigation. The DOE misapplies U.S. air quality regulations, ignores the Colorado River Basin water quality ceiling for salinity, and ignores other environmental impacts in Mexico. Inclusion of these effects further demonstrates the need for mitigation and conditional permitting.

The DOE should not place the economic interests of U.S. power developers ahead of the public health of U.S. and Mexican citizens, nor ahead of the need to protect the New River, an important source of fresh water for the Salton Sea National Wildlife Refuge. **I urge you to craft adequate air and water quality mitigation measures in the final EIS and in any permits based upon them.**

Sincerely,
Merril Cousin
1506-25th Ave. S
Seattle, WA 98144

0039-1

Document 0039

Ms. Ellen Russell

Dear Ms. Russell,

I am very concerned about U.S. power plant developers taking advantage of less stringent standards in Mexico to profit at the expense of public health and the environment. I ask that the Department of Energy require that Sempra Energy and Intergen mitigate the impacts of their power plants before granting presidential permits, and that DOE condition any permits on mitigation.

The draft EIS prepared by DOE for these two power plants clearly identifies these and other significant air and water impacts, while at the same time concluding that these impacts do not reach a sufficient level of significance to require mitigation. DOE misapplies U.S. air quality regulations, ignores the Colorado River Basin water quality ceiling of 4,000 mg/l salinity, and ignores impacts in Mexico when inclusion of these impacts further demonstrates the need for impact mitigation and conditional permitting.

DOE should not place the economic interests of U.S. power developers ahead of the public health of U.S. and Mexican citizens living in the vicinity of these plants, nor ahead of the need to protect the New River, an important source of fresh water for the Salton Sea National Wildlife Refuge. I urge you to craft adequate air and water quality mitigation measures in the final EIS and in any permits based thereon, that effectively address the air and water quality impacts caused by these two power plants.

Sincerely,

Maureen Lattimore
6221 S Madison ST
Burr Ridge, Illinois 60527

0038-1

Document 0038

Ellen Russell
NEPA Document Manager
Office of Fossil Energy (FE-27)
U.S. Department of Energy
1000 Independence Avenue, SW.
Washington, DC 20585-0350

Dear Ellen Russell,

I learned about U.S. power plant developers tattempting to take advantage of less stringent environmental standards in Mexico during the NEPA process. It is very important the full NEPA process not be averted, shortened or avoided. That is your responsibility as a government worker and a US citizen.

The current NEPA regulation requires that Sempra Energy and Intergen mitigate the impacts of their power plants before being granted presidential permits, and that DOE condition any permits on mitigation.

That process must take into account the emission offsets for nitrogen oxide (NOx) and particulate emissions from Intergen's La Rosita Power Complex and Sempra's Termoelectrica de Mexicali.

The draft Environmental Impact Statement (EIS) prepared by the DOE for these two power plants clearly identifies significant air and water impacts, while at the same time concludes that these problems do not reach a sufficient level of significance to require mitigation.

I will be looking for your decision on this matter and your response.

Sincerely

Christine Powell

PO Box 1583

El Granada, California 94018

Document 0040

Ms. Ellen Russell

Sincerely,

John Fowler
1146 Wrightstown Road
Newtown, Pennsylvania 18940-9602

Dear Ms. Russell,

I am very concerned about U.S. power plant developers taking advantage of less stringent standards in Mexico at the expense of public health and the environment. I ask that the Department of Energy require that Sempra Energy and Intergen mitigate the impacts of their power plants before granting presidential permits, and that DOE condition any permits on mitigation.

Communities along the U.S.-Mexico border suffer from poor air quality and scarcity of clean water. Imperial County, California, has the highest childhood asthma rate in the state. Pulmonary sickness rates are also elevated in Mexicali, a city of 600,000 just south of Imperial County in Mexico. Intergen failed to install advanced NOx controls on one of its export turbines on start-up in June, 2003. Hundreds of tons of NOx beyond what had been estimated when DOE initially granted Intergen a permit were therefore released. This incident proves that, in addition to adequate mitigation measures, ongoing monitoring, reporting, and enforcement provisions in the presidential permits are vital.

0040-1

The two power plants divert tremendous amounts of low salinity water from the New River to evaporative cooling towers -- water that would otherwise flow to the Salton Sea National Wildlife Refuge in Imperial County, California. The Salton Sea suffers from increasing salinity that may ultimately jeopardize its status as one of the most important migratory bird habitats in the West.

0040-2

Water diversion accentuates New River and Salton Sea salinity, and reduces the volume of the Sea, exposing more shoreline to wind erosion, resulting in up to 100 tons per year of additional particulate matter. The draft EIS prepared by DOE for these two power plants clearly identifies these and other significant air and water impacts, while at the same time concluding that these impacts do not reach a sufficient level of significance to require mitigation. DOE misapplies U.S. air quality regulations, ignores the Colorado River Basin water quality ceiling of 4,000 mg/l salinity, and ignores impacts in Mexico when inclusion of these impacts further demonstrates the need for impact mitigation and conditional permitting.

0040-3

DOE should not place the economic interests of U.S. power developers ahead of the public health of U.S. and Mexican citizens living in the vicinity of these plants, nor ahead of the need to protect the New River, an important source of fresh water for the Salton Sea National Wildlife Refuge. I urge you to craft adequate air and water quality mitigation measures in the final EIS and in any permits based thereon, that effectively address the air and water quality impacts caused by these two power plants.